

# EXHIBIT C



Department of Health and Human Services  
OFFICE OF INSPECTOR GENERAL  
OFFICE OF INVESTIGATIONS



## Request for Information or Assistance

To: Letco Medical & Subsidiaries

The Office of Investigations (OI), a division of the Office of Inspector General of the Department of Health and Human Services (HHS), pursuant to the authority contained in 5 U.S.C. App. 3 et seq., requests that you furnish information or assistance as follows:

ZMC Pharmacy LLC / ZMC Pharmacy  
1041 S Main St.  
Royal Oak, MI 48067  
DEA #FZ0899445

☒ See attached, if checked.

Pertinent sections of the United States Code and the Code of Federal Regulations are set forth on the following page. The request is made for health oversight and/or law enforcement purposes in connection with an official investigation being conducted by OI.

Office: Chicago Regional Office

Address: 300 River Place Dr. # 2500 Detroit, MI 48207

Requested by (Name): Nicholas Sultana

Date: Jan 7, 2021

Title: Special Agent

Phone Number: (313) 495-1770

Signature:

**NICHOLAS SULTANA**

Digitally signed by NICHOLAS SULTANA  
Date: 2020.10.08 11:40:53 -04'00'

Pursuant to the authority contained in 5 U.S.C. App. 3 *et seq.*, the Inspector General (or his delegate) is authorized to:

- 1) have access to all records, reports, audits, reviews, documents, papers, recommendations, or other material available to HHS that relate to programs and operations with respect to which the Inspector General has responsibilities under this Act (5 U.S.C. App. 3 § 6(a)(1));
- 2) request such information or assistance as may be necessary for carrying out the duties and responsibilities provided by this Act from any Federal, State, or local government agency or unit thereof (5 U.S.C. App. 3 § 6(a)(3)); and
- 3) require by subpoena the production of all information documents, reports, answers, records, accounts, papers, and other data and documentary evidence necessary in the performance of the functions assigned by this Act, which subpoena, in the case of contumacy or refusal to obey, shall be enforceable by order of any appropriate United States District Court (5 U.S.C. App. 3 § 6(a)(4)).

Additional authority is found in Title II of the Health Insurance Portability and Accountability Act, also known as HIPAA (42 U.S.C. § 1320a-7c(a)), which directs the Attorney General and the HHS Inspector General (on behalf of the Secretary) to establish a health care fraud and abuse control program that includes, in part, “conduct[ing] investigations, audits, evaluations and inspections relating to the delivery of and payment for health care.” The Act specifies that authorities conferred by 5 U.S.C. App. §§ 6(a)(3)-6(a)(9) (some of which are quoted above) are also available to the Inspector General of the Department of Health and Human Services “as necessary with respect to the activities under the fraud and abuse control program” established under HIPAA.

Furthermore, section 6402 of the Patient Protection and Affordable Care Act of 2010 added section 1128J of the Social Security Act (42 U.S.C. § 1320a-7k), which states that the Inspector General may, for purposes of protecting the integrity of the Medicare and Medicaid, obtain information from any individual or entity that -

- (1) is a provider of medical or other items or services, supplier, grant recipient, contractor, or subcontractor; or
- (2) directly or indirectly provides, orders, manufactures, distributes, arranges for, prescribes, supplies, or receives medical or other items or services payable by any Federal health care program regardless of how the item or service is paid for, or to whom such payment is made.

Information that the Inspector General may obtain under this provision includes any supporting documentation necessary to validate claims for payment or payments under Medicare or Medicaid and any records necessary for evaluation of the economy, efficiency, and effectiveness of the programs under Medicare or Medicaid (42 U.S.C. § 1320a-7k).

Please be advised that under the HIPAA privacy regulations, the Office of Inspector General is considered to be a “health oversight agency.” 45 C.F.R. § 164.501. As such, HIPAA covered entities are permitted to disclose protected health information to the Office of Inspector General for the performance of health oversight activities. 45 C.F.R. § 164.512(d).

The Office of Inspector General's oversight responsibilities include Centers for Medicare & Medicaid Services (CMS) programs, and the Office of Inspector General has the same documentary access rights as CMS with respect to these programs. Under Medicare Part D regulations at 42 C.F.R. § 423.505(e), the Part D sponsor must make available to HHS and its designees “any books, contracts, records and documentation of the *Part D plan sponsors, first tier, downstream and related entity(s), or its transferee* that pertain to *any aspect of services performed, reconciliation of benefits liabilities, and determinations of amounts payable under the contract*” (emphasis added). In addition, under 42 C.F.R. § 423.505(i)(2), each Part D sponsor agrees to require all first tier, downstream, and related entities to agree that HHS or their designees have a right to audit, evaluate, collect, and inspect any books, contracts, or electronic systems of such entities related to CMS' contract with the Part D sponsor.

1. Complete clientele file for listed pharmacy.
2. All documents related to the sale or purchase of medications and products, including but not limited to sales invoices and other sales documents.
3. All documents related to credit applications and / or contracts with the listed pharmacy.
4. All documents related to the purchase of products and medications by the above listed pharmacy, including for each purchase the National Drug Code (NDC), product description, total quantity purchased, and returns and back orders. For your convenience, in lieu of the documents listed, you can provide an aggregated report (Microsoft Excel format preferred) for all products and medications purchased by the pharmacy listed above.

Please include NDC, product description, and total quantity purchased. Please ensure that the aggregated quantity takes into account any returns or back orders.

**From: 1/1/2011 - Present**

United States Department of Health and Human Services  
Office of Inspector General  
Office of Investigations  
300 River Place Drive, Suite 2500  
Detroit, Michigan 48207  
Telephone- (313) 495-1770  
Fax- (313) 656-0289



Department of Health and Human Services  
OFFICE OF INSPECTOR GENERAL  
OFFICE OF INVESTIGATIONS



## Request for Information or Assistance

To: McKesson Corp.

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Office: Chicago Regional Office

Address: 300 River Place Dr. # 2500 Detroit, MI 48207

Requested by (Name): Nicholas Sultana

Date: Oct 8, 2020

Title: Special Agent

Phone Number: (313) 495-1770

Signature:

NICHOLAS SULTANA

Digitally signed by NICHOLAS SULTANA  
Date: 2020.10.08 11:40:53 -04'00'

*This document, including any attachments and information contained therein, is the property of HHS OIG and is for OFFICIAL USE ONLY. The original and any copies of the report must be appropriately controlled and maintained. Disclosure to unauthorized persons without prior written approval of the Deputy Inspector General for Investigations or his/her designee is strictly prohibited and may subject the disclosing party to liability. Unauthorized persons may include, but are not limited to, individuals referenced in the report, contractors, and individuals outside the HHS. Public disclosure is determined by the Freedom of Information Act (Title 5, U.S.C., Section 552) and the Privacy Act (Title 5, U.S.C., Section 552a).*

McKesson Corporation 000001

OI-2 May 2020

McKesson Corporation

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**From: 1/1/2012 - Present**

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Office of Inspector General  
Office of Investigations  
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